

BILLY J. WILLIAMS, OSB #901366
United States Attorney
District of Oregon
KATHERINE C. DE VILLIERS
Katie.de.Villiers@usdoj.gov
Assistant United States Attorney
United States Attorney's Office
District of Oregon
1000 SW Third Ave., Suite 600
Portland, Oregon 97204-2902
Telephone: 503-727-1000
Facsimile: 503-727-1117

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 3:17-cv-01928-MA

v.

**\$50,000 IN UNITED STATES
CURRENCY, *in rem*,**

**COMPLAINT *IN REM* FOR
FORFEITURE**

Defendant.

Plaintiff, United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and Katherine C. de Villiers, Assistant United States Attorney, for its Complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendant, *in rem*, \$50,000 in United States currency, in the form of a Bank of America Cashier's Check No. 0820907987, was seized in the District of Oregon, and is/are now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendant, *in rem*, \$50,000 in United States currency, in the form of a Bank of America Cashier's Check No. 0820907987, represents proceeds derived from violations of 18 U.S.C. § 542, and is forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the Declaration of Robert J. Priddy, Special Agent, Homeland Security Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of Defendant, *in rem*, \$50,000 in United States currency, in the form of a Bank of America Cashier's Check No. 0820907987; that due notice be given to all interested persons to appear and show cause why forfeiture of this Defendant, *in rem*, should not be

///

///

///

///

decreed; that due proceedings be had thereon; that this Defendant, *in rem*, be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this action.

Dated this 1st day of December 2017.

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Katie de Villiers
KATHERINE C. DE VILLIERS
Assistant United States Attorney
(503) 727-1000

VERIFICATION

I, Robert J. Priddy declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with Homeland Security Investigations and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Robert J. Priddy
ROBERT J. PRIDDY
Special Agent
Homeland Security Investigations